

United States District Court					
SOUTHERN DISTRICT OF FLORIDA-MIAMI DIVISION					
CRUZ VALDIVIESO FIGUERA, Plaintiffs, vs. ALL VIP CARE INC. AND LIZ VELAZQUEZ MCKINNON, Defendants.			DEFENDANT/COUNTER-PLAINTIFF (ALL VIP CARE, LLC) <u>AMENDED TRIAL EXHIBIT LIST</u> <u>WITH PLAINTIFF'S OBJECTIONS</u> CASE NO.: 0:22-CV-61553-DIMITROULEAS/HUNT		
PRESIDING JUDGE HONORABLE WILLIAM P. DIMITROULEAS		PLAINTIFF'S/COUNTER-DEFENDANT ATTORNEY FAIRLAW FIRM Brian H. Pollock, Esq. 135 San Lorenzo Ave Suite 770 Coral Gables, FL 33146		DEFENDANT'S /COUNTER-PLAINTIFF'S ATTORNEY FLORIDA HEALTHCARE LAW FIRM. Randy M. Goldberg Esq., 151 NW 1 st Avenue., Delray Beach, FL 33444	
TRIAL DATE(S) October 23, 2023		COURT REPORTER		COURTROOM DEPUTY	
PLTF. NO	DATE OFFERED	MARKED	OBJECTIONS	ADMITTED	Exhibit
1			R, UP, H		Plaintiff's W-9 (Redacted)
2			A, R, I, UP, H		All VIP Care Home Agency License from State of Florida.
3			A, R, I, UP, H		All VIP Care Nurse Registry License from State of Florida.
4			R, C, H		Affidavit of Angela Melendez
5			R, C, H		Statement of Angela Melendez
6			R, C, H		Statement by Diana Ramirez of Angela Melendez
7			A, R, H, NP		AHCA Profile Report on Plaintiff

Objection Codes (per Local Rule 16.1)

1. A–Authenticity
 - I–Contains inadmissible matter (mentions insurance, prior conviction, etc.)
 - R–Relevancy
 - H–Hearsay
 - UP–Unduly prejudicial-probative value outweighed by undue prejudice
 - P–Privileged

Add'l Objections

- C–Cumulative
- NP–Not Produced/Provided In Discovery Period

Defendants reserve the right to amend this exhibit list.

Submitted on October 17, 2023

s/ Randy M. Goldberg, Esquire
Florida Healthcare Law Firm
FBN: 045187
151 NW 1st Avenue
Delray Beach, FL 33444
754-224-0867
Randy@FloridaHealthcarelawFirm.com
RMGEsquire@gmail.com